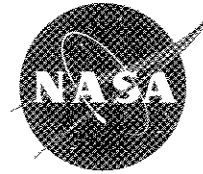


National Aeronautics and Space Administration  
**George C. Marshall Space Flight Center**  
Marshall Space Flight Center, AL 35812



May 11, 2010

Reply to Attn of:

LS01 (AMM)

**MEMORANDUM FOR RECORD**

**FROM:** LS01/William J. Bierbower

**SUBJECT:** Approval for MSFC Center Director to Attend a Pre-launch Reception Sponsored by Jacobs Technology, Inc.

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

The MSFC Center Director, who has senior institutional and project responsibilities, has been invited to attend a pre-launch reception sponsored by Jacobs Technology, Inc. (Jacobs) at the Atlantis Restaurant at the Hilton Oceanfront Hotel-Cocoa Beach, Florida, on or about May 13, 2010, from 8:00 p.m. – 10:30 p.m. This event is to be held in conjunction with the launch of STS-132 at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, academia, elected officials, NASA employees, supplier network contractors, media, and members of the public. The reception is valued at \$15 per person and approximately 300 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Jacobs is a contractor that is currently providing engineering support services to Marshall Space Flight Center. The Marshall Center Director presently, or may in the near future, have extensive involvement in matters relating to Jacobs' business interests.

I have determined that free attendance of the Center Director at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of the Center Director at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having the Center Director attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, the Center Director may accept free attendance at the event. He may also accept an invitation for his spouse or guests. Free attendance by employees whose duties do not affect the industry sponsors is addressed in a separate determination.

Jacobs Engineering, Inc. is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they consume at the reception.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "W. J. Bierbower". The signature is fluid and cursive, with the first name "William" and last name "Bierbower" clearly distinguishable.

William J. Bierbower  
Chief Counsel